



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100, BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

JUN - 6 2013

Bob Flint, Executive Director
 Springfield Regional Development Corporation (SRDC)
 14 Clinton Street, Suite 7
 Springfield, Vermont 05156

Re: PCB Cleanup and Disposal Approval under §§ 761.61(a) and (c)
 Jones and Lamson Plant #1, Springfield Vermont

Dear Mr. Flint:

This is in response to your Notification¹ for a proposed PCB cleanup at the former Jones and Lamson Plant #1 located at 160 Clinton Street in Springfield, Vermont (the Site). PCB-contaminated wastes, including building materials and soils, have been identified that exceed the allowable PCB levels for *unrestricted use* under the federal PCB regulations at 40 CFR § 761.61(a).

The Springfield Regional Development Corporation (SRDC) is proposing a phased approach to address PCB contamination in an approximately 270,000 square foot (ft²) area of the building and in certain additional outbuildings and exterior land areas on the property. The PCB cleanup and disposal plan submitted under §§ 761.61(a) and (c) includes the following activities that will be conducted in 2013:

➤ Part A

- Remove top 1 foot of ground surface (i.e., soil and the concrete pad) in Transformer Courtyard 1 and dispose as a less than (<) 50 parts per million (ppm) PCB waste;
- Remove approximately 135 square feet (ft²) of concrete located in the interior hallway and dispose as a < 50 ppm PCB waste;

¹ Information was provided on your behalf by the Johnson Company on behalf of SRDC to satisfy the notification requirement under 40 CFR §§ 761.61(a)(3) and (c). Information was provided dated June 3, 2010 (email Transformer Oil PCB Results); June 10, 2010 (email Scope of Work and Cost Analysis); May 9, 2011 (Self Implementing PCB Cleanup Notification (SIP)); April 6, 2012 (Response to EPA Comments and Modified SIP and Risk-Based PCB Cleanup); February 22, 2013 (SIP and Risk-Based PCB Cleanup, Rev. 2); February 28, 2013 (Response to EPA Comments); April 30, 2013 (Final Report Phase II ESA Above Ground Storage Tank Vault); May 1, 2013 (email Response to EPA Comments April 20, 2013); May 7, 2013 (email Part C Figure 7, Rev. 2); May 9, 2013 (email Response to EPA comments on AST Vault Report); May 13, 2013 (email Response to EPA comments on AST Vault Report); May 20, 2013 (Addendum to SIP and Risk-Based PCB Cleanup, Rev. 2); and, May 30, 2013 (SIP and Risk-Based PCB Cleanup, Rev. 3). These documents will be referred to as the "Notification."

- Remove sump and floor drain sediments and dispose as a greater than or equal to (\geq) 50 ppm PCB waste. Existing piping will be filled with concrete without verification sampling, unless accessible and can be removed;
- Dispose of PCB-contaminated wastes with < 50 ppm in accordance with § 761.61(a)(5)(i)(B)(2)(ii) and ≥ 50 ppm PCB-contaminated wastes in accordance with § 761.61(a)(5)(i)(B)(2)(iii);
- Collect soil verification samples in accordance with Subpart O to confirm that PCB concentrations are less than or equal to (\leq) 10 ppm;
- If PCB concentrations are > 1 ppm but ≤ 10 ppm, backfill excavated area with a compliant cap in accordance with § 761.61(a)(7); and,
- Record a deed restriction in accordance with § 761.61(a)(8) if PCBs are found at > 0.74 ppm in soils, which will identify PCB concentrations remaining at the Site and will require maintenance of the clean cover.

➤ Part B

- Remove top 1 foot of ground surfaces (i.e., soil and concrete) in Transformer Courtyard 5 and dispose as a < 50 ppm PCB waste;
- Remove 2 feet of soil in the former Outdoor Transformer Storage Area and dispose as a < 50 ppm PCB waste;
- Demolish the Northern Transformer House and remove and dispose of the concrete floor as a < 50 ppm PCB waste;
- Remove dust and soil from the surface of the concrete floor in the Southern Transformer House and dispose as < 50 ppm PCB waste;
- Remove sump and floor drain sediments and dispose as a ≥ 50 ppm PCB waste. Existing piping will be filled with concrete without verification sampling, unless accessible and can be removed;
- Dispose of PCB-contaminated wastes with < 50 ppm in accordance with § 761.61(a)(5)(i)(B)(2)(ii) and ≥ 50 ppm PCB-contaminated wastes in accordance with § 761.61(a)(5)(i)(B)(2)(iii);
- Collect soil verification samples in accordance with Subpart O to confirm that PCB concentrations are less than or equal to (\leq) 10 ppm;
- If PCBs > 1 ppm but ≤ 10 ppm, backfill excavated area with a compliant cap in accordance with § 761.61(a)(7); and,

- Record a deed restriction in accordance with § 761.61(a)(8) if PCBs are found at > 0.74 ppm in soils, which will identify PCB concentrations remaining at the Site and will require maintenance of the clean cover.

➤ Part C Area

- Demolish chip shed and ramp. Remove an approximately 100 ft² area of concrete floor and dispose as a ≥ 50 ppm PCB waste with remaining PCB-contaminated concrete floor and associated wood disposed of as a < 50 ppm PCB waste; remove approximately 111 cubic yards (yd³) of soils (0 to 1 foot over 3,000 square foot (ft²) area) and dispose as a < 50 ppm PCB waste; and, remove approximately 275 yd³ of soils (0 to 4 feet over 1,850 ft² area) and dispose as a ≥ 50 ppm;
- Remove and dispose of approximately 546 yd³ of soils located within the Solid Waste Disposal Area (SDWA) as a < 50 ppm PCB waste with exception of the SWDA-C subarea (0 to 2 feet in a 1,050 ft² area), which will be disposed of as a ≥ 50 ppm PCB waste;
- Remove and dispose of approximately 11 yd³ of grinding swarf material located along the riverbank as a ≥ 50 ppm PCB waste;
- Continue recovery of the non-aqueous phase liquid (LNAPL) located on the surface of the groundwater and monitor conditions to confirm that PCBs are not migrating in the groundwater;
- Remove sump and floor drain sediments and dispose as a ≥ 50 ppm PCB waste. Existing piping will be filled with concrete without verification sampling, unless accessible and can be removed;
- Remove and dispose of PCB-contaminated water located in the Paint Pit;
- Dispose of PCB-contaminated wastes with < 50 ppm in accordance with § 761.61(a)(5)(i)(B)(2)(ii) and ≥ 50 ppm PCB-contaminated wastes in accordance with § 761.61(a)(5)(i)(B)(2)(iii);
- Collect soil verification samples in accordance with Subpart O to confirm that PCB concentrations are less than or equal to (\leq) 10 ppm, with exception of the grinding swarf area located along the river bank, which will be cleaned to achieve a less than or equal to (\leq) 1 ppm PCB cleanup standard;
- If PCBs > 1 ppm but ≤ 10 ppm, backfill excavated area with a compliant cap in accordance with § 761.61(a)(7); and,
- Record a deed restriction in accordance with § 761.61(a)(8) if PCBs are found at > 0.74 ppm in soils, which will identify PCB concentrations remaining at the Site and will require maintenance of the clean cover.

With the exception of the characterization sampling frequency, the LNAPL removal, and in-place disposal of inaccessible floor drain piping, the proposed cleanup and disposal meets the notification requirements under § 761.61(a). Given the information provided and the proposed cleanup plan, EPA has determined that the alternative sampling frequency is sufficient to delineate PCB contamination at the Site for the purposes of removal and disposal. In addition to the sampling frequency, certain characterization samples collected prior to 2009 were extracted for PCB by SW-846 Method 3550B rather than Method 3540. Samples collected at later dates did not show significantly different PCB results and the use of the data will not impact the cleanup plan and/or the disposal decisions for the PCB waste. Additional delineation sampling of building materials may also be conducted pending a decision on redevelopment of Parts B and C. Accordingly, EPA has determined that the alternative characterization sampling will not result in an unreasonable risk to public health or the environment and EPA may approve the characterization sampling under 40 CFR § 761.61(c).

With respect to the LNAPL and inaccessible piping that will be filled with concrete following sediment removal, EPA has determined that in-place disposal of the piping and continued removal of the LNAPL as proposed will not present an unreasonable risk to public health or the environment provided the groundwater is monitored to confirm that PCBs are not migrating from the Site. EPA may approve in-place disposal of the piping and management of the LNAPL area in accordance with § 761.61(c).

As indicated in the Notification, SRDC is proposing to delay certain cleanup efforts at the Site pending an identified redevelopment or at a timeframe no later than 5 years. Specifically, PCB remediation of the following areas is proposed to be conducted at a future date:

- Transformer Courtyard 2
- Part B area concrete floor slab and brick walls
- Transformer Courtyard 3
- Part C area concrete floor slab, brick walls and steel columns.
- If walls and roof of Part B or Part C areas are demolished prior to redevelopment and the concrete floor slab remains, an interim measure that includes covering the > 10 ppm PCB-contaminated concrete slab/floor with plastic sheeting and a minimum of 4 inches of clean material will be implemented to isolate the slab until a decision regarding the slab is made.

As indicated in the Notification, access to these areas will be controlled until a cleanup can be implemented. EPA has determined that temporary in-place disposal of the PCBs in the areas identified above will not present an unreasonable risk of harm to public health or the environment provided these areas remain vacant and access is controlled. Given the financial considerations and the fact that the PCB cleanup may be driven by the identified redevelopment, EPA may approve the proposed plan in accordance with § 761.61(c).

SRDC may proceed with its project in accordance with 40 CFR §§ 761.61(a) and (c); the Notification; and this Approval, subject to the conditions of Attachment 1. Under this Approval, EPA is reserving its rights to require additional investigation and/or cleanup should EPA determine that an unreasonable risk of injury to public health or the environment exists at the Site.

Please be aware that approval for the temporary in-place disposal of the PCB contamination in the areas identified above shall expire on July 1, 2018. An extension to this timeframe may be requested pursuant to Attachment 1, Condition 1. Given that PCBs will remain up to a 5 year period, EPA is requiring that a deed notice be recorded on these areas in accordance with § 761.61(a)(8) (see Attachment 1, Condition 15).


Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527 / Facsimile: (617) 918-0527

Please be aware that issuance of this Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release SRDC or any prior or future owner from compliance with any applicable requirements of federal, state or local law; or 3) release SRDC or any prior or future owner from liability for, or otherwise resolve, any violations of federal, state or local law.

EPA shall not consider this project complete until it has received all submittals required under this Approval. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,

A handwritten signature in black ink, appearing to read "James T. Owens, III", followed by a horizontal line and a small flourish.

James T. Owens, III
Director, Office of Site Remediation & Restoration

Attachment 1: Approval Conditions

cc: D. Mears, Commissioner VTDEC
R. Kay, Johnson Company
T. Coppolino, VTDEC
A. Peterson, EPA
File

ATTACHMENT 1

PCB CLEANUP AND DISPOSAL APPROVAL CONDITIONS FORMER JONES AND LAMSON PLANT #1 160 CLINTON STREET, SPRINGFIELD, VERMONT

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to *PCB remediation waste* located at the Site and identified in the Notification.
 - a. In the event that the Springfield Regional Development Corporation (SRDC) identifies any other PCB contamination that is regulated under the federal PCB Regulations at 40 CFR Part 761, it may request a modification to this Approval or it must submit a separate plan to address the contamination under § 761.61.
 - b. EPA's approval for the short-term in-place disposal of PCBs in Transformer Courtyards 2 and 3 and the PCBs in the Part B and Part C areas shall expire on July 1, 2018. At least 60 days prior to this expiration date, SRDC shall submit its plan to address the PCB contamination in accordance with § 761.61 for EPA review and approval.
 - i) SRDC may conduct cleanup and removal of the PCB-contaminated materials in these areas in a phased approach under this Approval. Information on the proposed PCB cleanup of the area shall be submitted at least 60 days prior to the proposed date for initiation of the PCB cleanup for each phase.
 - ii) Request for an extension of the July 1, 2018 expiration date shall be made in writing at least 120 days prior to the expiration date and shall include a justification for the extension. EPA may require the submission of additional information in connection with any extension request.
2. SRDC shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.

¹ Information was provided on your behalf by the Johnson Company on behalf of SRDC to satisfy the notification requirement under 40 CFR §§ 761.61(a)(3) and (c). Information was provided dated June 3, 2010 (email Transformer Oil PCB Results); June 10, 2010 (email Scope of Work and Cost Analysis); May 9, 2011 (Self Implementing PCB Cleanup Notification (SIP)); April 6, 2012 (Response to EPA Comments and Modified SIP and Risk-Based PCB Cleanup); February 22, 2013 (SIP and Risk-Based PCB Cleanup, Rev. 2); February 28, 2013 (Response to EPA Comments); April 30, 2013 (Final Report Phase II ESA Above Ground Storage Tank Vault); May 1, 2013 (email Response to EPA Comments April 20, 2013); May 7, 2013 (email Part C Figure 7, Rev. 2); May 9, 2013 (email Response to EPA comments on AST Vault Report); May 13, 2013 (email Response to EPA comments on AST Vault Report); May 20, 2013 (Addendum to SIP and Risk-Based PCB Cleanup, Rev. 2); and, May 30, 2013 (SIP and Risk-Based PCB Cleanup, Rev. 3). These documents will be referred to as the "Notification."

3. In the event that the cleanup plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.
4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.
5. SRDC must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, SRDC shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.
6. SRDC is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time SRDC has or receives information indicating that SRDC or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.
7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by SRDC are authorized to conduct the activities set forth in the Notification. SRDC is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.
8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release SRDC or any prior owner from compliance with any applicable requirements of federal, state or local law; or 3) release SRDC or any prior owner from liability for, or otherwise resolve, any violations of federal, state or local law.
9. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761 Subpart D.

NOTIFICATION AND CERTIFICATION CONDITIONS

10. This Approval may be revoked if the EPA does not receive written notification from SRDC of its acceptance of the conditions of this Approval within 10 business days of receipt.
11. With exception of the notification requirements specified under Condition 1.b., SRDC shall notify EPA in writing of the scheduled date of commencement of on-site activities at least 1 business day prior to conducting any work under this Approval.

12. Prior to initiating onsite work for each phase of work under this Approval, SRDC shall submit the following information:
 - a. a contractor work plan, prepared and submitted by the selected demolition or remediation contractor(s), detailing the procedures that will be employed for removal of PCB-contaminated materials and for monitoring during cleanup activities. This work plan should also include information on waste storage, handling, and disposal for each waste stream type;
 - b. a certification signed by its selected demolition or remediation contractor, stating that the contractor has read and understands the Notification, and agrees to abide by the conditions specified in this Approval; and,
 - c. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the analytical and quality assurance requirements specified in the Notification and in this Approval.

CLEANUP AND DISPOSAL CONDITIONS

13. The cleanup level for bulk *PCB remediation waste* (i.e., soil) at the Site shall comply with the requirements under § 761.61(a)(5) but may be more stringent to meet the PCB industrial soil screening value published in the Vermont Department of Conservation *Investigation and Remediation of Contaminated Properties Procedure* document dated April 5, 2012.
 - a. Bulk *PCB remediation waste* samples (i.e., soil) shall be collected on a bulk basis (i.e., mg/Kg) and results shall be reported on a dry weight basis. Verification sampling shall comply with the Subpart O requirements, and samples shall be collected from excavation bottoms and from excavation sidewalls, as applicable.
 - b. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846 for solid matrices and Method 3500B/3510C of SW-846 for aqueous matrices; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.
14. All PCB waste (regardless of concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with § 761.40; stored in a manner prescribed in § 761.65; and, disposed of in accordance with § 761.61(a)(5), unless otherwise specified below:

- a. Non-liquid cleaning materials, such as PPE and similar materials resulting from decontamination, shall be disposed of in accordance with 40 CFR § 761.79(g)(6).
- b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).
- c. PCB-contaminated water generated during decontamination or dewatering shall be decontaminated in accordance with § 761.79(b)(1) or disposed of under § 761.70.

DEED RESTRICTION AND USE CONDITIONS

15. Within sixty (60) days of completing the initial remedial activities described in the Notification and authorized under this Approval, SRDC shall submit for EPA review and approval, a draft deed restriction for the areas of the Site where PCB concentrations remain at > 1 ppm. The deed restriction shall include: a description of the extent and levels of contamination at the Site; a description of the cleanup actions conducted at the Site; a description of the use restrictions for the Site, as applicable; and the long-term, monitoring and maintenance requirements for groundwater and for caps, as applicable, which may be addressed by the long-term monitoring and maintenance plan ("MMIP", see Condition 19). Within seven (7) days of receipt of EPA's approval of the draft deed restriction, SRDC shall record the deed restriction. A copy of this Approval shall be attached to the deed restriction.

SALE, LEASE OR TRANSFER OF SITE

16. SRDC shall notify the EPA of the sale, lease or transfer of any portion of the Site where PCBs > 1 ppm remain, in writing, no later than 10 days prior to such action. This notification shall include the name, address, and telephone number of the new owner(s). In this event, SRDC shall continue to be bound by all the terms and conditions of this Approval, unless EPA allocates some or all of this Approval's responsibilities to the new owner through the issuance of a new approval associated with those activities. The procedures for the issuance of a new approval are as follows:
 - a. The new owner(s), lessee or transfer entity must request, in writing, that the EPA issue a new approval to the new owner(s), lessee or transfer entity which transfers some or all responsibilities to comply with the terms and conditions of this Approval to that entity or entities;
 - b. The EPA reviews the request, and determines whether to issue a new approval; and,

- c. The new owner(s), lessee or transfer entity provides written notification to the EPA of its acceptance of and intention to comply with the terms and conditions of the new approval. The new approval may be withdrawn if the EPA does not receive written notification from the new owner(s), lessee or transfer entity of its acceptance of, and intention to comply with, the terms and conditions of the new approval within ten (10) days of the date of the new approval. Under such circumstances, all terms and conditions of this Approval will continue to be binding on SRDC.
17. In the event that the sale, lease or transfer of the Site with > 1 ppm PCBs will involve or result in a change in the use of the Site, EPA may revoke, suspend, and/or modify this Approval or the new approval if it finds, due to the change in use, that the measures implemented under this Approval will not be protective of public health or the environment. The new owner shall record any amendment to the deed restriction, resulting from any approved modification(s), within sixty (60) days of such change(s).
18. In any sale, lease or transfer of the Site, SRDC shall retain sufficient access rights to enable it to continue to meet its obligations under this Approval, except as provided above.

INSPECTION, MONITORING, MODIFICATION AND REVOCATION CONDITIONS

19. Within sixty (60) days of receipt of this Approval, SRDC shall submit for EPA's review and approval, a detailed long-term monitoring and maintenance implementation plan (MMIP) for groundwater and for compliant caps.
- a. The MMIP shall include: a description of the activities that will be conducted, including inspection criteria and frequency; sampling locations; sampling protocols, sampling frequency, and analytical criteria; and reporting requirements.
 - b. The MMIP shall include a communications component which details how the maintenance and monitoring results will be communicated to the Site tenants, as applicable.
 - c. SRDC shall submit the results of these long-term monitoring and maintenance activities to EPA. Based on its review of the results, EPA may determine that modification to the MMIP is necessary and/or that additional mitigation measures are necessary.
 - d. SRDC shall incorporate any changes to the MMIP required by EPA. Activities required under the MMIP shall be conducted until such time that EPA determines, in writing, that such activities are no longer necessary.

20. Any proposed modification(s) in the plan, specifications, or information in the Notification must be submitted to EPA no less than 14 calendar days prior to the proposed implementation of the change. Such proposed modifications will be subject to the procedures of 40 CFR § 761.61(a)(3)(ii).
21. Any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
22. Any misrepresentation or omission of any material fact in the Notification or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
23. Approval for these activities may be revoked, modified or otherwise altered: if EPA finds a violation of the conditions of this Approval or of 40 CFR Part 761, including EPA's PCB Spill Cleanup Policy, or other applicable rules and regulations; if EPA finds that these activities present an unreasonable risk to public health or the environment; or if EPA finds that changes are necessary to comply with new rules, standards, or guidance for such approvals. SRDC may apply for appropriate modifications in the event new rules, standards, or guidances come into effect.
24. SRDC shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.

RECORDKEEPING AND REPORTING CONDITIONS

25. SRDC shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the cleanup and the analytical sampling shall be established and maintained by SRDC in one centralized location until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection by authorized representatives of EPA.
26. As required under Condition 19 of this Approval and unless otherwise modified, SRDC shall submit the results of the long-term monitoring and maintenance activities to EPA as specified in the final MMIP to be approved by EPA.

27. SRDC shall submit a final Completion Report (Report) to EPA within 60 days of completion of each phase of PCB cleanup authorized under this Approval. At a minimum, this final report shall include: a short narrative of the cleanup and disposal activities; characterization and verification sampling analytical results, as applicable; copies of the accompanying analytical chains-of-custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCB waste disposed of and the size of the remediated area(s); copies of manifests and/or bills of lading; and, copies of certificates of disposal or similar certifications issued by the disposer. The Report shall also include a copy of the recorded deed restriction and a certification signed by the Site owner verifying that the authorized activities have been implemented in accordance with this Approval and the Notification.
28. Required submittals shall be mailed to:
- Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code: OSRR07-2
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527
29. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self disclosure or penalty policies.

END OF ATTACHMENT 1